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**BEFORE THE PUBLIC UTILITIES COMMISSION**
**OF THE STATE OF CALIFORNIA**

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# OPENING COMMENTS OF THE ALLIANCE FOR RETAIL ENERGY MARKETS ON TYPE AND POINT OF REGULATION ISSUES

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Date: December 3, 2007

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# OPENING COMMENTS OF THE ALLIANCE FOR RETAIL ENERGY MARKETS ON TYPE AND POINT OF REGULATION ISSUES

In response to the *Administrative Law Judges' Ruling Requesting Comments on Type and Point of Regulation Issues* dated November 9, 2007 ("ALJ Ruling"), the Alliance for Retail Energy Markets ("AReM") respectfully submits these opening comments.[1]

## A. INTRODUCTION

The ALJ Ruling poses a series of questions concerning the pros and cons of various proposed models for regulating GHG emissions in California's electricity sector, including: (1) a load-based cap-and-trade system; (2) a deliverer/first seller approach; (3) a pure source-based cap-and-trade system (regulation of in-state generation only); and (4)

[1] AReM is a California non-profit mutual benefit corporation formed by electric service providers ("ESPs") that are active in California's direct access market. The positions taken in this filing represent the views of AReM but not necessarily those of individual members or affiliates of its members with respect to the issues addressed herein.

a source-based system for in-state generation, and a load-based system for imports. The ALJ Ruling also posits the deferral of implementing a California-only cap-and-trade system and working with other Western states to develop a regional cap-and-trade system and/or work toward a national cap-and-trade program; in the meantime, existing state programs in the electricity sector—e.g., energy efficiency programs and the Renewables Portfolio Standard ("RPS")—would be "ramped up" to meet the GHG emissions reduction goals for California established by Assembly Bill ("AB") 32.

Of the proposed regulatory models, pending the implementation of a regional and federal source-based cap-and-trade program, AReM believes that the state's GHG emissions reduction goals would be best achieved by implementing a deliverer/first seller approach for regulating emissions in the electricity sector in combination with a statewide (i.e., economy-wide) cap-and-trade system. AReM believes further that the disadvantages of relying on indirect approaches such as increasing energy efficiency and RPS targets as the primary means of reducing GHG emissions in the electricity sector are underscored by the advantages of moving forward with a well-designed cap-and-trade system. AReM expands on these points in our responses to the questions posed in the ALJ Ruling.

## B. RESPONSES TO QUESTIONS

### 1. General

**Q1. What do you view as the incremental benefits of a market-based system for GHG compliance, in the current California context?**

Compared to command-and-control regulation, a market-based approach system for GHG compliance—i.e., a cap-and-trade system—will have several benefits. Experience shows that market-based systems with transparent pricing produce greater

efficiency, promote innovation, provide necessary investment signals, and reduce consumer costs. The same benefits can be expected to result from adoption of a market-based system for GHG compliance. That is, the market will develop the most efficient means for meeting emissions reduction goals, including investment in new technologies and the development of innovative compliance strategies, and at a lower overall cost to consumers. Furthermore, the experience gained by California in developing and implementing a market-based system for GHG compliance can be expected to produce long-term benefits for the California economy and the state's businesses and consumers, particularly given the likelihood that GHG emissions will eventually be regulated at the federal level under a market-based system whose development can be guided by a well-designed market-based approach in California.

**Q2. Can a market-based system provide additional emissions reductions beyond existing policies and/or programs? If so, at what level? How much of such additional emission reductions could be achieved through expansion of existing policies and/or programs?**

AReM believes that a market-based system for GHG compliance would provide additional emissions reductions beyond those achievable through "ramping up" existing policies and programs. While AReM has not performed a detailed analysis of the comparative effectiveness of a market-based system and policy/program expansion in terms of reducing GHG emissions, it seems clear that it is unrealistic to expect the latter to produce significant overall emissions reductions in the electricity sector. That is because electricity demand has been steadily increasing in California and can be expected to continue to do so in the future as the state's population and economy grow.

In any event, expanding existing policies and programs would likely be very expensive and would place a disproportionate share of the GHG compliance burden on

load-serving entities, and there are limits to how much could be achieved thereby in terms of reducing GHG emissions. For one thing, the industrial and commercial sectors in California have already made significant efforts at increasing energy efficiency, and the extent to which those sectors can further reduce their energy consumption is limited. There are also practical limits on how much new renewable generation can be developed in California and neighboring states due to cost considerations, equipment shortages, transmission constraints, the NIMBY problem, and the fact that many of the remaining locales where new renewable generation could be developed are environmentally sensitive.

### 2. Principles or Objectives to Be Considered in Evaluating Design Options

**Public Utilities Commission Staff proposes that the following principles or objectives be used to evaluate GHG program design options and to develop recommendations regarding a GHG regulatory approach.**

- **Goal attainment: Does the approach being considered have any particular advantages in terms of meeting overall emission reduction goals? For example, does the approach have any advantages to promoting energy efficiency, combined heat and power, or renewable energy?**

- **Cost minimization: Is the approach likely to minimize the total cost to end users of achieving a given GHG reduction target?**

- **Compatibility with wholesale markets and the Market Redesign and Technology Upgrade: What are the implications of the approach on efficient functioning of wholesale markets generally and the California Independent System Operator day-ahead and real-time markets?**

- **Legal risk: Is the approach at greater relative risk of being delayed or overturned in court?**

- **Environmental Integrity: Does the approach mitigate or allow contract shuffling and the leakage of emissions occurring outside of California as a result of efforts to reduce emissions in California?**

- **Expandability: Would the approach integrate easily into a broader regional or national program? A related consideration is the suitability of the approach as a model for a national or regional program.**

- **Accuracy: Does the approach support accuracy in reporting and, therefore, ensure that reported emission reductions are real?**

- **Administrative Simplicity: Does the approach promote greater simplicity for reporting entities, verifiers, and state agency staff? How easy will the program design be to administer?**

**Q3. Do you agree with this set of objectives? Are there other objectives or principles that you wish to see included? If so, please include your recommendations and reasoning. Finally, please rank the objectives above, and any additional factors you propose, in order of importance.**

AReM generally agrees with the proposed objectives, and believes that the paramount objectives should be goal attainment and expandability. Another important goal should be that system implementation does not *unfairly* advantage or disadvantage any class of generators or retail providers. AReM ranks these objectives as follows:

1. Goal attainment: Pending the implementation of a source-based point of regulation system at the regional and federal level, a deliver/first seller market-based system is most likely to produce the desired result of reducing overall GHG emissions in California's electricity sector, as capturing the cost of emissions at the generator level would be the most effective and transparent means of creating incentives for investment in, and dispatch of, low-emission resources while minimizing leakage and contract shuffling through power imports.
2. Expandability: A deliver/first seller market-based system could readily be integrated with a regional or national source-based GHG compliance system.

3. Equity: A deliver/first seller market-based system would be least likely to unfairly advantage or disadvantage any class of consumers orretail providers.
4. Cost minimization: A deliver/first seller market-based system would be the most cost-effective means of reducing GHG emissions in the electricity sector.
5. Compatibility with wholesale markets and MRTU: Because a deliver/first seller market-based system provides for direct cost assignment to the generators and power importers, it will create the best price transparency and granularity to stimulate emission reduction investments in the long-run. The system will ensure a level playing field for all consumers and retail providers, will not discriminate between in-state generation and imported power, and therefore will be the least likely to interfere with the wholesale markets or degrade grid reliability.
6. Administrative Simplicity: A deliver/first seller market-based system would be relatively simple to administer.
7. Environmental Integrity: The potential problem of emissions leakage is created by having an emissions cap that applies to a limited geographic area rather than regionally or nationally. However, the implementation of the Emission Performance Standard contained in Senate Bill ("SB") 1368 will greatly minimize such leakage pending the adoption of a regional and national source-based cap-and-trade program.

8. Accuracy: While accuracy is important, it is most closely tied to implementation of a regional or national GHG compliance system and therefore is ranked lower by AReM.

9. Legal risk: AReM believes that deliver/first seller market-based system would be the least discriminatory and therefore the most likely to survive the inevitable legal challenges.

## 3. Load-Based Cap-and-Trade System Design

**Q4. With a load-based cap-and-trade system, should exports from in-state generation sources be included and accounted for under the cap?**

AReM reserves comment on this issue.

**Q5. How extensive do you view the threat of contract shuffling under a load-based program, given the accessibility of clean resources within the western interconnect? What mechanisms do you propose to combat this possibility? On what basis do you support your position?**

AReM reserves comment on this issue.

**Under a load-based system, three basic options may be used to match a retail provider's load to the sources of electricity used to serve the load: (1) the use of contracts and settlements data, (2) the development of a tracking system to facilitate matching sources to loads, with unclaimed sources pooled and assigned to all retail providers for any electricity that cannot be accounted for on a specified basis, and (3) the use of a tracking system and tradable emission attribute certificates (TEAC) to ensure that all electricity is assigned.**

**Q6. Which of these systems best accounts for all imports? What are the advantages and disadvantages of each potential tracking system in terms of accuracy, cost of development and administration of tracking systems, costs of administration to the parties, and overall costs to ratepayers? Are there alternative tracking approaches that you would recommend, and for what reasons?**

AReM believes the TEAC model used in conjunction with a regional tracking system such as the Western Renewable Energy Generation Information System ("WREGIS") would best account for all imports and has several other advantages over

other tracking mechanisms. Most significantly, it would be compatible with future regional and national market-based systems and would provide retail providers with flexibility in meeting GHG compliance requirements.

**Q7. If a load-based approach is pursued, would the potential benefits of a full TEAC system be great enough to warrant the start-up and administrative costs?**

Yes, particularly given that much of the start-up costs associated with a TEAC model would be avoided since it could be built into WREGIS; hence, the associated administrative and start up costs are minimized with a common registry and trading platform that has already been implemented for renewable generation in the Western Electricity Coordinating Council ("WECC").

## 4. Source-based Cap-and-trade System Design Options

### 4.1. Pure Source-based (GHG Regulation of In-state Generation Only)

**Under an in-state-only source-based approach, the regulated entities would be the power plants located in California that generate electricity and emit GHGs. Under such a system, electricity use associated with imports would not be directly regulated under the cap-and-trade system. Instead, other policies and programs such as energy efficiency and the Renewable Portfolio Standard (RPS) would be utilized to decrease reliance on imported GHG-intensive power sources.**

**Q8. Do you view this approach as compliant with Assembly Bill (AB) 32? Please support your answer.**

As AB 32 simply requires that the state of California account for GHG emissions in setting the emissions cap and implement emissions reduction measures, a source-based system would not be inconsistent with the statute.

**The threat of leakage can be viewed over two time horizons: short-term and long-term.**

**Q9. In light of the relatively high capacity factors of carbon-intensive facilities outside the state, how extensive do you expect the short-term threat of substituting higher-carbon imports for in-state generation to**

**be? Might this possibility be dealt with through specific program design (e.g., allocations, limiting conditions, etc.)?**

AReM does not believe that emission leakage should be addressed through system design elements such as the allocation of allowances or limiting conditions, since such measures would result in inequities and interfere with the operation of the emissions trading market.

**Q10. Given existing procurement oversight and the prospect for a regional or federal GHG program in the foreseeable future, how extensive do you expect the threat to be of a longer-term shift of production to regions beyond the reach of a California source-based cap-and-trade regime?**

AReM reserves comment on this issue.

**Q11. If emissions associated with imported power are excluded from a cap-and-trade program, what policies beyond the existing suite of program including energy efficiency, California Solar Initiative, RPS, and Emission Performance Standard (EPS) do you recommend that California employ to achieve the necessary reductions from the electricity sector?**

AReM reserves comment on this issue.

**Q12. As the Public Utilities Commission does not currently have authority to oversee all energy efficiency and renewable procurement programs for all kinds of retail providers (investor owned utilities (IOUs), community choice aggregators (CCAs), electric service providers (ESPs), and publicly owned utilities (POUs)), which agency(ies) should fill in any gaps? Which agency should be responsible for overseeing energy efficiency and renewable procurement for POUs? Would the California Air Resources Board (ARB) have the authority to require certain energy efficiency and renewable targets be met by POUs?**

ESPs are already subject to the Commission's authority for purposes of the RPS program. However, AReM strongly opposes any extension of that authority in connection with energy efficiency programs as inappropriate and unnecessary.

**Q13. What sources would a source-based system cover? Could it cover California utility-owned facilities located outside of California?**

AReM reserves comment on this issue.

**Q14. Would a strengthened EPS assist in reducing emissions due to California imports? What recommended changes would you make to the EPS?**

No, it would not. AReM also believes that making the EPS more restrictive would be less efficient and more costly for consumers than a market-based system.

**4.2. Deliverer/First Seller**

**Q15. Please comment on the "First Seller Design Description" paper, which is Attachment A to this ruling. Does the paper accurately describe the deliverer/first seller program? If not, describe your concerns and include an accurate description from your perspective.**

The "First Seller Design Description" paper appears to provide an accurate overview of the deliverer/first-seller approach.

**4.3. Source-based for In-state Generation, Load-based for Imports**

**Q16. Please describe in detail your view of how this option would work.**

For in-state generation, the point of regulation would be the generator. For imports, the point of regulation would be the power importer.

**Q17. Do you support such an approach? Why or why not?**

AReM does not support this approach, as it would appear to be administratively complex and inefficient compared to a deliverer/first seller system.

**Q18. Does this approach have legal issues associated with it? Provide a detailed analysis and legal citations.**

No comment.

**Q19. If retail providers are responsible for internalizing the cost of carbon for imported power, all power generated in-state may need to be tracked to load to avoid double regulation of in-state power. Do you agree?**

Yes. This is another reason why a deliverer/first seller approach would be less complex and more efficient.

**Q20. If that is the case, does a mixed source-based/load-based approach offer any advantages compared to a load-based approach in terms of simplifying reporting and tracking? What if the load-based system uses TEACs? How could imports be differentiated from in-state generation in a way that reduces the complexity of reporting and tracking compared to a load-based approach?**

This question and sub-questions illustrate the added complexity that would be created by adopting a hybrid source-based/load-based approach.

**5. <u>Deferral of a Market-based Cap-and-Trade System</u>**

**In this scenario, a California-only cap-and-trade system would not be implemented for the electricity sector at this time. Instead, California would work with other Western states to develop a Western Climate Initiative cap-and trade system and/or work toward a national cap-and-trade program. In the meantime, existing policies and programs in the electricity sector may need to be ramped up to meet the AB 32 goals.**

**Several variations of this option may be possible. For example, a load-based cap could still be developed for retail providers, with assignment of individual entity obligations and trading available within the California electricity sector only, but not with other sectors. A second alternative would be to develop individual entity caps (or carbon budgets) which entities could not exceed without facing penalties or fees, but not allow for any trading of allowances at this time. Another option would be to ramp up the mandatory levels of existing programs such as the energy efficiency and RPS programs to higher goals, and make all retail providers obligated to meet these additional goals, without assigning specific cap levels to individual entities.**

**Q21. How important is it that a cap-and-trade system be included in the near-term as part of the electricity sector's AB 32 compliance strategy?**

It would be counter-productive to defer implementation of a cap-and-trade system and attempt to regulate GHG emissions in the electricity sector in isolation. Without a

statewide cap-and-trade system in place, GHG compliance will likely be more complicated for regulated entities and more expensive for consumers. A command-and-control system, with regulated entities subject to caps without there being a market to buy and sell allowances, would be too rigid and would likely increase compliance costs. Simply ramping up RPS requirements and placing ESPs under regulation for purposes of energy efficiency goals would also be costly and inefficient, and the increased regulatory burden imposed on such entities would act as a barrier to market entry. Given the requirements of AB 32, the best option for California is to implement a market-based system that encompasses all sector and sources.

**Q22. Would your answer to Q21 be different if there is no market-based cap-and-trade system? If so, please explain.**

No, as AReM believes none of the alternative scenarios are acceptable.

**Q23. Address the following:**

- **How emission reduction obligations could be met if there is no cap-and-trade system for the electricity sector,**
- **How increased programmatic goals would impact rates, and**
- **How deferral of a cap-and-trade program for the electricity sector would facilitate or hinder California's integration into a subsequent regional or federal program.**

With regard to the first two issues, please see AReM's response to Question 21. As for the third issue, not implementing a cap-and-trade system for the electricity sector would delay the development of the reporting and tracking mechanisms necessary for implementation of broader-based cap-and-trade system (i.e., statewide, regional and/or national systems).

**Q25. If neither a regional system nor a national system is implemented within a reasonable timeframe, should California proceed with implementing its own cap-and-trade system for the electricity sector? If so, how long should California wait for other systems to develop before acting alone?**

Yes. Because AReM believes that a market-based system is the most cost-effective means of reducing GHG emissions in the electricity sector, a statewide cap-and-trade system is necessary and sufficient for compliance, regardless of whether there is a regional or federal system in place. A market-based system provides allocative and productive efficiencies, such that the lowest compliance cost is ensured for the ultimate consumer.

**Q26. What flexible compliance mechanisms could be integrated into a non-market based GHG emission reduction approach?**

AReM seeks flexible compliance options under a GHG emission reduction program such as offsets, trading, banking, and/or borrowing. For example, flexible compliance tools that are provided to retail sellers under the RPS program (forward banking, carry-over of deficits) should be provided to entities regulated under the GHG program, regardless of whether a cap-and-trade system is also implemented.

**Q27. If a market-based cap-and-trade system is not implemented for the electricity sector in 2012, how would you recommend addressing early actions that entities may have undertaken in anticipation of a market?**

AReM reserves comment on this issue.

**6. Recommendation and Comparison of Alternatives**

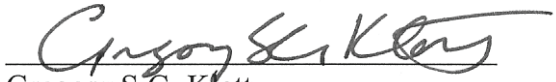
**Q28. Submit your comprehensive proposal for the approach California should utilize regarding the point of regulation and whether California should implement a cap-and-trade program at this time for the electricity sector. If you recommend that another approach be considered besides those detailed above, propose it here. If you recommend one of the above options, give as detailed a discussion as possible of how the approach would work.**

For the reasons discussed above and in previous comments, AReM recommends that California implement a deliverer/first seller approach for the electricity sector and a statewide (economy-wide) cap-and trade system.

**Q29. Address and compare how each of the alternatives identified in the above questions, and the proposal you submit in response to the preceding question, would perform relative to each of the principles or objectives listed above and any other principles or objectives you propose. For each alternative, address important tradeoffs among the principles.**

Please see AReM's responses to Questions 1, 2 and 3.

Respectfully submitted,



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## CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of **Opening Comments of the Alliance for Retail Energy Markets on Type and Point of Regulation Issues** on all parties of record in proceeding **R. 06-04-009** by serving an electronic copy on their email addresses of record and by mailing a properly addressed copy by first-class mail with postage prepaid to each party for whom an email address is not available.

Executed on December 3, 2007, at Woodland Hills, California.

Michelle Dangott

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